

# **Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

CUNG LE, NATHAN QUARRY, JON FITCH,  
BRANDON VERA, LUIS JAVIER  
VAZQUEZ, AND KYLE KINGSBURY, *on  
behalf of themselves and all others similarly  
situated,*

Plaintiffs,

v.

ZUFFA, LLC d/b/a ULTIMATE FIGHTING  
CHAMPIONSHIP AND UFC,

Defendant.

Case No. 2:15-cv-01045-RFB-BNW

**DECLARATION OF BACH-VIET NGUYEN OF ANGEION GROUP, LLC  
RE FINAL REPORT TO THE COURT REGARDING DISTRIBUTION OF THE NET  
SETTLEMENT FUND**

I, Bach-Viet Nguyen, declare and state as follows:

1. I am a Project Manager at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). I am over 21 years of age and am fully familiar with the facts contained herein based upon my personal knowledge.
2. Angeion is not related to or affiliated with the Plaintiffs, the Defendant, Class Counsel or Defendant’s Counsel.
3. Angeion was retained as the Claims Administrator for the Settlement and appointed by the Court pursuant to the Order Granting Plaintiffs’ Unopposed Motion to Approve Class Notice Plan, at ¶1 (ECF No. 921), and the Order Preliminarily Approving Settlement, Preliminarily Approving the Plan of Allocation, Approving the Notice Plan, and Approving the Proposed Schedule for Completing the Settlement Process (the “Preliminary Approval Order”), at ¶9 (ECF No. 1053).
4. The purpose of this declaration is to provide the Court with a report regarding the tasks and

methodologies employed by Angeion in processing the claims, preparing for distribution of the Net *Le v. Zuffa* Settlement Fund (defined in the Plan of Allocation at 1 (ECF No. 1045-5)), and administering the Settlement.

### **Issuance of Claim Forms and Review of Claims**

5. On May 2, 2025, as set forth in the Plan of Allocation, Angeion mailed to 1,121 Class Members for whom Angeion has a valid and current address separate, individualized claim forms pre-populated with information for each Class Member's qualifying Event Compensation and qualifying Number of Bouts during the Class Period. *See* ECF 1045-5, ¶ 1. Additionally, Angeion sent email notices to Class Members for whom Angeion has a valid and current email address. The claim form and emailed notices provided a claim submission deadline of June 16, 2025, and stated that claims could be submitted electronically via a personalized online portal available on the Settlement Website or may be emailed or mailed to Angeion. True and accurate copies of the forms of mailed and emailed notices are attached hereto as **Exhibits A** and **B**, respectively.

6. Angeion understands from Co-Lead Class Counsel that Counsel expended substantial effort locating, contacting, and assisting Class Members in submitting their claim forms. Over the course of several months, Co-Lead Class Counsel called, emailed, and contacted Class Members through social media, and networked to locate Class Members who had not submitted a claim. Co-Lead Class Counsel also assisted Class Members with completing claim forms, submitting the necessary tax forms, and answered questions about the claim process, which included holding Q&A sessions (that were presented in multiple foreign languages) to help educate Class Members about the claims process. Co-Lead Class Counsel participated in public interviews, submitted social media posts, and updated websites to locate and inform Class Members of the claims submission deadline and the need to timely submit their claim forms.

7. Angeion received a total of 1,088 claims submissions from Class Members.<sup>1</sup> Each claim was assigned a unique Claim Number and imported into Angeion's claims database along with

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<sup>1</sup> After consultation with Co-Lead Class Counsel, one claim submitted after the deadline was accepted as a "Late Approved Claim" and is included in the total number of claim submissions. *See* ECF 1045-5 ¶ 8.

any supporting documentation submitted.

8. Class Members who wanted to contest their pre-determined Event Compensation and Number of Bouts information were required to submit additional support for their additional compensation and bout amounts, while Class Members who agreed with the qualified amounts provided in the claim form were only required to verify, sign, and return the pre-populated form. Angeion completed a thorough review and analysis of claim submissions, including identifying duplicative, incomplete, or otherwise deficient claims. The chart below reflects the breakdown of claim submissions received:

Description	Count
Accepted the Event Compensation/Number of Bouts	1,051
Contested the Event Compensation/Number of Bouts	37
<b>Total</b>	<b>1,088</b>

9. Of the 37 Class Members who contested their predetermined Event Compensation and/or Number of Bouts information, 9 provided sufficient documentation to support an adjusted amount for their Event Compensation and/or Number of Bouts, while 28 Class Members failed to provide supporting documentation and were flagged as deficient.

#### **Deficiency Notification and Review of Responses**

10. On June 30, 2025, Angeion emailed a Notice of Deficiency to those 28 Class Members who submitted a deficient claim. The Notice of Deficiency described the reasons for the deficiency and provided instructions on how to cure the deficient claim by providing additional information and documentation. The Notice of Deficiency included a deadline to respond by July 28, 2025. A true and accurate copy of the Notice of Deficiency attached hereto as **Exhibit C**.

11. As of the date of this declaration, of the 28 noticed Class Members with deficient claims, Angeion has received and reviewed 13 deficiency responses.<sup>2</sup> After reviewing these responses, 8 claims were cured of their deficiency or no longer contested their Event Compensation and/or Number of Bouts, and 15 remained deficient but partially approved, meaning their award will be

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<sup>2</sup> After consultation with Co-Lead Class Counsel, one late received response was reviewed as valid and is included in the total number of deficiency responses.

calculated based on the greater of the Event Compensation and/or Number of Bouts information contained in either (i) the prepopulated claim form (itself based upon data produced by Defendant) or (ii) the additional data the Class Member substantiated with valid supporting documents provided through the deficiency review process.

12. As a result of the claim and deficiency process discussed above, all 1,088 Bout Class Member claims were determined to be valid and payable, with none rejected.

13. As explained above, Angeion received valid claims from 1,088 Class Members out of the 1,121 Class Members eligible to participate in the Settlement, which represents just over 97 percent of the Class who are entitled to a distribution from the Net *Le v. Zuffa* Settlement Fund. Of the thousands of class actions Angeion has administered, a 97 percent claims received from identified and noticed class members is the highest claims rate for any antitrust class action that Angeion has administered.

#### **Distribution To Eligible Claimants**

14. Angeion worked with EconOne and Co-Lead Class Counsel in determining the amount of the estimated Net *Le v. Zuffa* Settlement Fund. Accounting for the \$375,000,000 *Le v. Zuffa* Settlement Fund together with interest earned in the amount of \$6,648,867.82, minus Court-approved attorneys' fees (including interest) and costs in the total amount of \$126,701,006.61,<sup>3</sup> service awards for the Class Representatives and Plaintiff Quarry's Settlement as approved by the Court in the total amount of \$1,250,000, tax payments made in the amount of \$364,036, estimated future tax payments in the amount of \$1,237,000, Angeion's noticing and administration expenses in the amount of \$150,383.67, a reserve for Angeion's anticipated administration fees in the amount of \$200,336, EconOne's professional fees associated with the Settlement in the amount of \$43,856, and a reserve for unexpected expenses or issues in the amount of \$350,000,<sup>4</sup> the Net *Le*

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<sup>3</sup> The Court awarded attorneys' fees of \$115.2 million, plus accrued interest, and \$9,572,685.17 in litigation expenses. *See* ECF 1065 ¶¶ 7-8.

<sup>4</sup> The \$350,000 withheld from the Net *Le v. Zuffa* Settlement Fund is reasonably calculated to address any unanticipated disputes or discrepancies arising after distribution of the *Le v. Zuffa* Settlement Fund. Subject to further Order of the Court and where economically feasible, any monies from the Net *Le v. Zuffa*

v. *Zuffa* Settlement Fund was calculated to be \$251,352,249.54:

Settlement Amount	\$375,000,000.00
Interest Earned	\$6,648,867.82
Attorneys' Fees (including interest) and Costs	(\$126,701,006.61)
Service Awards & Plaintiff Quarry's Settlement	(\$1,250,000.00)
Notice & Administration Expenses Through June 2025	(\$150,383.67)
Tax Payments	(\$364,036.00)
Estimated Future Tax Payments	(\$1,237,000.00)
Future Estimated Notice & Administration Expenses	(\$200,336.00)
EconOne Professional Fees	(\$43,856.00)
Reserve Fund	(\$350,000.00)
<b>Net Settlement Fund</b>	<b>\$251,352,249.54</b>

15. The Court approved Plan of Allocation divides the Net *Le v. Zuffa* Settlement Fund into two sub-tranches, with 70 percent of the allocation to comprise the “Event Compensation sub-tranche” and 30 percent of the allocation to comprise the “Number of Bouts sub-tranche.” ECF 1045-5 ¶¶ 4-5. The Plan of Allocation further provides all Claimants will receive a minimum recovery amount of \$15,000. *See id.* ¶ 4.

16. As described above, Angeion reviewed the claims (including all deficiency responses received to date) and determined that a total of 1,088 Class Member claims with Event Compensation during the Class Period for this group totaling \$538,853,643.23 and the Number of Bouts during the Class Period for this group totaling 5,318 were valid and eligible for a Settlement distribution payment. Each eligible Claimant's *pro rata* share of the Event Compensation sub-tranche, which totals \$175,946,574.68,<sup>5</sup> was determined by multiplying the total value of the Event Compensation sub-tranche by the following ratio: (a) the numerator is the Event Compensation amount for that Claimant, and (b) the denominator is the sum total of all Event Compensation amounts by all valid Claimants. Additionally, the eligible Claimant's *pro rata* share of the Number

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Settlement fund that remain after the initial distribution will be distributed to Class Claimants in an additional *pro rata* distribution or distributions. If economically infeasible, Co-Lead Class Counsel shall make an application to the Court for such sums to be used to make *cy pres* payments to an appropriate charitable organization. *See* ECF 1045-5 ¶ 16.

<sup>5</sup> This amount was determined by multiplying the Net Settlement Fund amount of \$251,352,249.54 by 0.70 (70%).

of Bouts sub-tranche, which totals \$75,405,674.86,<sup>6</sup> was determined by multiplying the total value of the Number of Bouts sub-tranche by the following ratio: (a) the numerator is the Number of Bouts for that Claimant during the Class Period, and (b) the denominator is the sum total of all Bouts by all valid Claimants during the Class Period. Using this formula, the average distribution payment from the estimated Net *Le v. Zuffa* Settlement fund will be \$231,022.29; the median distribution payment will be \$86,034.65; the high payment will be \$10,334,240.72; and the lowest distribution payment will be \$16,138.45.

#### Next Steps

17. Angeion will continue to maintain and monitor the Settlement Website, dedicated email address, and toll-free hotline and respond to general Class Member inquiries and Claimant requests for information regarding filed claims, Notices, and issued distribution payments.

18. There are currently no rejected claims, however, should any future claims be received and rejected, Angeion will send a Notice of Denial in accordance with the Plan of Allocation. *See* ECF 1045-5 ¶ 7.

19. Angeion will distribute payment of approved claims. Angeion will also process distribution checks returned as undeliverable and requests from Claimants in the event a distribution payment is lost or damaged or otherwise requires reissuance.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 2, 2025

Bach-Viet Nguyen  
BACH-VIET NGUYEN

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<sup>6</sup> This amount was determined by multiplying the Net Settlement Fund amount of \$251,352,249.54 by 0.30 (30%).